

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

FRANCISCO JAVIER DE JESUS MARTINEZ

DEBTOR(S)

CASE NO. 19-07155-EAG

CHAPTER 13

MOTION TO WITHDRAW LEGAL REPRESENTATION

TO THE HONORABLE COURT:

COMES NOW Undersigned Counsel and very respectfully **STATES, ALLEGES** and **PRAYS** as follows:

1. Debtor, FRANCISCO JAVIER DE JESUS MARTINEZ and undersigned counsel have irreconcilable differences with respect to the procedural legal matters in the case;
2. Accordingly, and in compliance with LBR 9010-1(d)(3)(C) undersigned, herein, seeks leave of this Honorable Court to withdraw as legal counsel;
3. Undersigned has contacted the Debtor about this Motion For Leave to Withdraw as Counsel for the Debtor.
4. If granted, the Debtor respectfully requests that any communication regarding the present case be notified to the following address:

**Francisco De Jesus Martinez
Urb. Royal Town
J2 Calle 26
Bayamon PR 00956**

6. Furthermore, the Debtor respectfully requests thirty days, from the date an Order granting this Motion is entered to: (a) obtain replacement counsel, and (b) that all pending matters before this Honorable Court be stayed or held in abeyance for such 30-day period.

WHEREFORE, undersigned counsel respectfully requests an Order from this Honorable Court granting the Motion for Withdrawal as Counsel of Record for the Debtor.

NOTICE

TO PARTIES IN INTEREST:

Within fourteen (14) days after services as evidenced by the certification, and an additional three (3) days pursuant to Fed.R.Bank.P. 9006(f) if you were served by mail, any party against whom this Application has been served, or any party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this Application with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the Application will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise

CERTIFICATE OF SERVICE: I hereby certify that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Office of the United States Trustee, and all CM/ECF participants. In addition, via First Class U.S. Mail, the Debtor has sent a copy of this Motion to: **Francisco Javier De Jesus Martinez, Urb. Royal Town, J2 Cale 26, Bayamon PR 00956.**

Respectfully Submitted,

San Juan Puerto Rico, this 21st day of November 2023

The Batista Law Group, PSC
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